

(Doc. 1.)

2.

As of this date, no opposing party has filed any statement of right or interest, answer or motion for summary judgment.

3.

Pursuant to Fed. R. Civ. P. 41(a)(1)(A) and (B), ING Bank hereby files this notice of dismissal of its Verified Complaint, without prejudice, to its rights in the future to commence other litigation in this Court or in any other court or jurisdiction to arrest the Vessel as she may be located within those districts or jurisdictions.

Respectfully submitted:

/s/ Joseph R. Messa

**JOSEPH R. MESSA**

**Texas State Bar # 13970700**

**KING, KREBS & JURGENS, P.L.L.C.**

6363 Woodway, Suite 820

Houston, Texas 77057

Telephone: (713) 334-5644

Facsimile: (713) 334-5828

E-mail: [jmessa@kingkrebs.com](mailto:jmessa@kingkrebs.com)

**and**

**JAMES D. BERCAW**

**LAURA E. AVERY**

**(Motion for admission *pro hac vice* to be filed)**

**KING, KREBS & JURGENS, P.L.L.C.**

201 St. Charles Avenue, 45th Floor

New Orleans, Louisiana 70170

Telephone: (504) 582-3800

Facsimile: (504) 582-1233

E-Mail: [jbercaw@kingkrebs.com](mailto:jbercaw@kingkrebs.com)

[lavery@kingkrebs.com](mailto:lavery@kingkrebs.com)

***Attorneys for ING Bank N.V.***